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Jonathan Feldman and Patriot Exploration  
Company, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Millennium Drilling Co., Inc., a Delaware Corporation,

CASE NO.: 2:12-cv-00462-MMD-CWH  
(Base case)

**Plaintiff,**

vs.

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO  
FILE REPLIES**

Beverly House-Meyers Revocable Trust,  
Beverly House-Meyers, Trustee; Grace Mae  
Properties, LLC; Hamrick Trust, Robert H.  
Hamrick and Molly Kay Hamrick, Trustees;  
DOES I through X; and ROES I through X,

### (Third Request)

## Defendants.

Molly Hamrick, Beverly House-Myers, R&M  
Hamrick Family Trust;

CASE NO.: 2:13-cv-00078-MMD-CWH  
(Consolidated Case)

### Third-Party Plaintiffs.

1 vs.

2 Jonathan Feldman, Montcalm, LLC, Patriot  
 3 Exploration Company, LLC, Carter Henson,  
 4 Jr., Matthew Barnes, Robert Holt, Elizabeth  
 Holt, and Schain, Leifer, Guralnick,

5 Third-Party Defendants.

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7 Third-Party Defendants JONATHAN FELDMAN (“Feldman”), CARTER HENSON,  
 8 JR. (“Henson”), and PATRIOT EXPLORATION COMPANY, LLC (“Patriot”) (collectively,  
 9 the “Patriot Defendants”), Plaintiff MILLENNIUM DRILLING CO., Inc. (“Millennium”) and  
 10 Third-Party Plaintiffs/Defendants MOLLY HAMRICK, BEVERLY HOUSE-MYERS,  
 11 BEVERLY HOUSE-MYERS REVOCABLE TRUST, GRACE MAE PROPERTIES, LLC,  
 12 HAMRICK TRUST, ROBERT H. HAMRICK and R&M HAMRICK FAMILY TRUST  
 13 (collectively, the “Third-Party Plaintiffs”), by and through their respective undersigned counsel,  
 14 stipulate to the following and request an Order from this Court granting such stipulation:

15 1. On March 30, 2015, the Third-Party Plaintiffs filed their Points and Authorities  
 16 in Response to Third-Party Defendants Jonathan Feldman and Patriot Exploration Company’s  
 17 Omnibus Motion Re: (1) Partial Summary Judgment – Statute of Limitations; (2) Summary  
 18 Judgment for Res Judicata or Collateral Estoppel; and (3) Summary Judgment on Third-Party  
 19 Plaintiffs’ Claims for (1) Breach of Fiduciary Duty; (2) Breach of Contract; (3) Imposition of  
 20 Constructive Trust; (4) Unjust Enrichment; and (5) Money Had and Received. (Dkt. No. 214).

21 2. Additionally, on March 30, 2015, the Third-Party Plaintiffs filed their Points and  
 22 Authorities in Response to Third-Party Defendant Carter Henson’s Motion to Dismiss for Lack  
 23 of Personal Jurisdiction (Dkt. No. 215).

24 3. The Parties submitted a Stipulation and [Proposed] Order To Extend Deadline to  
 25 File Replies (First Request) on April 15, 2015 (Dkt. No. 216) seeking to extend the deadline for  
 26 the Replies to both motions to April 28, 2015.

27 4. The Court issued an order granting the Stipulation and [Proposed] Order to  
 28 Extend Deadline to File Replies (First Request) on April 16, 2015 (Dkt. No. 217).

1       5.     Because the parties were seeing to mediate the case between June 8-12, 2015, the  
2 parties submitted a Stipulation and [Proposed] Order To Extend Deadline to File Replies  
3 (Second Request) on April 28, 2015 (Dkt. No. 218) seeking to extend the deadline for the  
4 Replies to both motions to Friday, June 19, 2015.

5       6.     The Court issued an order granting the Stipulation and [Proposed] Order to  
6 Extend Deadline to File Replies (Second Request) on April 29, 2015 (Dkt. No. 219)

7       7.     Due to the schedule of the parties, their counsel and the available mediators, the  
8 matter was not set for meditation until Tuesday, June 16, 2015, before Eleissa Lavelle.  
9 Unfortunately, the matter did not resolve at the mediation.

10      8.     Because the mediation was not held until later than expected, and due to a  
11 medical procedure that counsel for the Patriot Defendants' had to undergo on Wednesday, June  
12 17, 2015, the parties have agreed to a one-week extension to submit the Replies to both  
13 motions.

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1           9. IT IS HEREBY STIPULATED AND AGREED that the deadlines for the Patriot  
2 Defendants' Replies to the above-referenced Motions be extended from June 19, 2015 to June  
3 26, 2015.

4 **HOWARD & HOWARD ATTORNEYS  
5 PLLC**

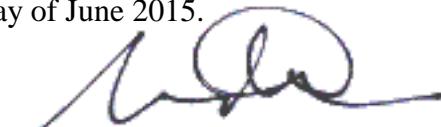
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14 /s/ Lance L. Livingston  
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20 *Attorneys for Third-Party Plaintiffs and  
21 Defendants*

22           **ORDER**

23           **IT IS SO ORDERED** this 22nd day of June 2015.



24           **UNITED STATES DISTRICT COURT JUDGE**

25           Respectfully submitted by:

26           **HOWARD & HOWARD ATTORNEYS PLLC**

27           /s/ Wade B. Gochnour  
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34 Company, LLC*

35 4840-8068-8933, v. 1

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